

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

IN THE MATTER OF REQUEST TO :
MAKE PUBLIC LIST OF : **Case No. 19-MC-00058 (BAH)**
INVESTIGATIVE MATTERS :
RELATED TO SPECIAL COUNSEL’S :
INVESTIGATION :

GOVERNMENT’S MOTION TO SUBMIT MATERIAL IN CAMERA AND EX PARTE

The United States of America, by and through the United States Attorney for the District of Columbia and the Department of Justice, National Security Division, files this motion to submit materials in camera and ex parte. This is a miscellaneous matter concerning a request to make public a list of matters related to the Special Counsel’s Office. The Court prepared sealed lists of docket information, available only to the government, and directed the government to notify the Court of any objections to releasing that information. As noted in the government’s status report, the government objects to releasing certain information contained in those sealed lists and is accordingly requesting that the Court add certain redactions before releasing those lists. In order to communicate the requested redactions without revealing the very information that is at issue, the government respectfully requests leave to file proposed redactions in camera and ex parte. The government further requests permission to file a declaration, in camera and ex parte, explaining the bases for these redactions, which concern law enforcement and intelligence interests. The government is lodging with the Court the proposed redactions and declaration along with this motion.

Respectfully submitted,

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